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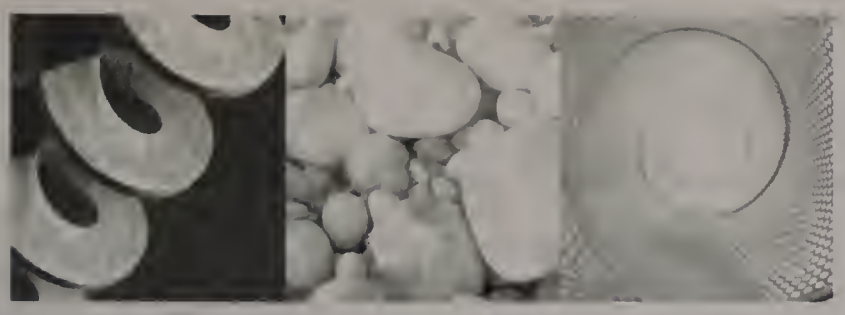

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RTN 3-23246

Partial Permanent Solution Statement for 6 Reed Court, Somerville, Massachusetts

50 Tufts Street Site, Somerville, Massachusetts

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June 1, 2016
Project 04516-3

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Appendices

A. MassDEP Form BWSC-104 "Permanent and Temporary Solution Statement"
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Executive Summary

On behalf of UniFirst Corporation (UniFirst) of Wilmington, Massachusetts, GEI Consultants, Inc. (GEI) prepared this Partial Permanent Solution Statement for 6 Reed Court, Somerville, Massachusetts (the Property), which is a portion of the 50 Tufts Street site (the Site; Fig. 1). The Site is identified by Massachusetts Department of Environmental Protection (MassDEP) Release Tracking Number (RTN) 3-23246. A Site Map that shows the Property in relation to the Site boundary is presented in Fig. 2. This document provides closure for a portion of the Site under the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) and indicates that a condition of No Significant Risk (NSR) exists at the Property.

A release of chlorinated volatile organic compounds (VOCs) to soil and groundwater at the Site was first reported to the MassDEP in 2002. Subsequent investigations at the Site identified chlorinated VOCs, particularly tetrachloroethylene (also called perchloroethylene [PCE]), in indoor air at 50 Tufts Street, and in groundwater and indoor air at residential and commercial properties in the vicinity of 50 Tufts Street.

There is no groundwater monitoring well located at the Property. However, based on the concentrations of chlorinated VOCs in groundwater in a monitoring well located approximately 20 feet (ft) from the Property, the concentration of PCE in shallow groundwater at the Property is estimated to be less than the laboratory reporting limit of 1 microgram per liter (µg/l). The Property is located within the Site solely due to its location over low concentrations of groundwater contamination in the deep overburden and bedrock.

Based on the following lines of evidence, GEI concludes that the vapor intrusion pathway is incomplete at the Property:

- Residual or connected phase dense non-aqueous phase liquid (DNAPL) has not been detected at or near the Property.
- Except for two detections of 1,1-dichloroethane (1,1-DCA) (4.3 µg/l and 2.5 µg/l) during the 17 sampling rounds since 2007, chlorinated VOCs have not been detected above laboratory reporting limits in shallow groundwater samples collected near the Property (MW120S).
- Chlorinated VOCs have not been detected in soil above laboratory reporting limits near the Property (MW120D).
- Individual chlorinated VOCs detected in the soil vapor samples collected from MW120S were below residential screening criteria presented in the MassDEP

Guidance "WSC No. 14-435: Interim Final Vapor Intrusion Guidance," dated October 2014 (2014 VI Guidance). The soil vapor samples were not collected from beneath the slab of the Property building; however, because the soil vapor sampling location is approximately 20 ft from the Property, they are an indicator of low soil vapor concentrations in this portion of the Site.

A Partial Permanent Solution Statement is appropriate for the Property based on the following:

- No Significant Risk: A condition of NSR to human health, safety, public welfare, and the environment exists for all receptors with No Conditions at the Property, and no remedial actions are required.
- Source Elimination and Control: There are no unpermitted releases of oil or hazardous material (OHM) at the Site, and the sources of OHM at the Site are eliminated to the extent feasible and are controlled.
- Migration Control: The groundwater and soil vapor plumes at the Site are stable.
- NAPL: Visible NAPL has not been observed at the Site, and any DNAPL that may be present is not migrating and exists in a stable configuration. The Phase III for the Site demonstrated that it is not feasible to eliminate DNAPL.
- An Activity and Use Limitation (AUL) is not required to maintain a condition of NSR at the Property.

1. Introduction

On behalf of UniFirst Corporation (UniFirst) of Wilmington, Massachusetts, GEI Consultants, Inc. (GEI) of Woburn, Massachusetts prepared this Partial Permanent Solution Statement for 6 Reed Court, Somerville, Massachusetts (the Property), which is a portion of the 50 Tufts Street site (the Site; Fig. 1). The Site includes 50 Tufts Street, surrounding residential and commercial properties to the east and immediately west of 50 Tufts Street, and the Michael E. Capuano Early Childhood Center (Capuano Center). A Site Map that shows the Property in relation to the Site boundary is presented in Fig. 2. Chlorinated volatile organic compounds (VOCs), particularly tetrachloroethylene (also called perchloroethylene [PCE]), have been detected in soil, groundwater (shallow and deep overburden, and bedrock), soil vapor, and indoor air at portions of the Site.

This document provides closure for the Property, which is a portion of the Site under the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000), and indicates that a condition of No Significant Risk (NSR) exists at the Property.

The Site is identified by Massachusetts Department of Environmental Protection (MassDEP) Release Tracking Number (RTN) 3-23246. The Immediate Response Action (IRA) Plan associated with RTN 3-23246 was submitted to MassDEP on January 9, 2006. The Site is currently classified Tier II. The "Phase II Comprehensive Site Assessment, Method 3 Risk Characterization, and Phase III Remedial Action Plan," (Phase II/III) for the Site was submitted to MassDEP on July 14, 2008. The "Phase IV Remedy Implementation Plan," (Phase IV) was submitted to MassDEP on August 10, 2009. The "Immediate Response Action Completion Report and Remedial Monitoring Report No. 11," (IRAC Report) was submitted to MassDEP on November 13, 2009, and the "Immediate Response Action Completion Report Addendum," was submitted to MassDEP on April 1, 2011. The "Phase IV Final Inspection Report, Remedial Monitoring Report No. 15, and Phase V Remedy Operation Status Report," was submitted to MassDEP on August 4, 2011. GEI continues to submit semi-annual Phase V Status Reports for the Site. The most recent Status Report was submitted to MassDEP on February 3, 2016.

1.1 Purpose

The purpose of this Partial Permanent Solution Statement, in accordance with the requirements of the MCP, is to document that a Permanent Solution has been achieved for a portion of the Site.

1.2 Scope

The scope of this Partial Permanent Solution Statement for the Property is to:

- Provide a summary of the environmental conditions.
- Evaluate the risk to human health, safety, public welfare, and the environment at the Property.
- Demonstrate that the applicable requirements for a Permanent Solution have been achieved.

1.3 Submittals

The original MassDEP transmittal form (BWSC-104) was submitted online via eDEP and a copy is included in Appendix A. As required by the MCP (310 CMR 40.1403(3)(f)), GEI submitted letters to the Somerville Chief Municipal Officer and the Board of Health notifying them of the availability of this Partial Permanent Solution Statement. Copies of the notification letters are in Appendix B.

1.4 Public Record

Documents related to the environmental investigations conducted at the Site are on file with the MassDEP Northeast Regional Office located at 205B Lowell Street in Wilmington, Massachusetts. Additionally, local public document repositories have been established at the Somerville Central Public Library and at the City of Somerville Office of Sustainability and Environment.

1.5 Contact Information

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1.6 Conceptual Site Model

GEI developed this Conceptual Site Model (CSM) to describe release mechanisms, contaminant distribution, and potential exposure pathways associated with the Property. The CSM is based upon the investigation data documented in the Phase II/III and IRAC Report. Site features associated with the CSM are shown in Fig. 2.

1.6.1 Property Location and Description

The Property is located within the Site boundary associated with a release of chlorinated VOCs to soil and groundwater at 50 Tufts Street, located approximately 750 feet (ft) southwest of the Property. The Property is located in a commercial/residential zoning district, fronts Oliver Street to the north, Knowlton Street to the east, Reed Court and residential property to the west, and is bounded by commercial property (Capuano Center) to the south. A multi-family residential building is located on the Property.

1.6.2 Contaminant Distribution

From approximately 1955 to approximately 2002, 50 Tufts Street was used for storage and distribution of industrial chemicals, laundry supplies, and dry cleaning supplies. Chemicals stored at and delivered to and from 50 Tufts Street included chlorinated solvents. These chlorinated VOCs – particularly PCE, trichloroethylene (TCE), and 1,1,1-trichloroethane (TCA) – have been detected in soil, soil vapor, indoor air, and groundwater at 50 Tufts Street. A release of chlorinated VOCs to soil and groundwater at the Site was first reported to MassDEP in 2002.

Chlorinated VOCs generally have not been detected in soils beyond the boundaries of 50 Tufts Street. Chlorinated VOCs have been detected at the Site in the shallow and deep overburden and bedrock groundwater. There is no groundwater monitoring well located at the Property. However, based on the concentration of chlorinated VOCs in shallow groundwater in a monitoring well located approximately 20 ft from the Property (MW-120S), the concentration of PCE in shallow groundwater at the Property is estimated to be less than the laboratory reporting limit of 1 microgram per liter (µg/l).

The northern boundary of the Site is based on the lateral extent of the deep overburden and bedrock groundwater plumes, where very low concentrations of PCE have been detected in groundwater collected from wells in till and bedrock (Fig. 2). The concentration of PCE in deep groundwater in a bedrock monitoring well located approximately 20 ft from the Property (MW-120D) has decreased over time ranging from 120 micrograms per liter (ug/l) to 40.4 ug/l. The Property is located within the Site solely due to its location over low concentrations of groundwater contamination in the deep overburden and bedrock.

1.6.3 Site Conditions

As presented in Phase V submittals for the Site, an evaluation of the MNA program indicates that the groundwater plumes are stable, overall groundwater concentrations of chlorinated VOCs are not increasing, and natural attenuation processes are occurring at the Site which will likely reduce contaminant concentrations in groundwater over time. Previous investigations have also demonstrated that soil vapor plumes are stable.

Visible NAPL has not been observed at the Site, and any DNAPL that may be present is not migrating and exists in a stable configuration. The Phase III demonstrated that it is not feasible to eliminate DNAPL at the Site. There are no unpermitted releases of oil or hazardous material (OHM) at the Site. Accordingly, all sources of OHM at the Site have been eliminated or controlled to the extent feasible.

2. Property Investigations

Since March 2006, GEI has conducted subsurface investigations that included collecting soil, groundwater, soil vapor, and indoor air samples across the Site for laboratory testing. The investigations that are representative of conditions at the Property are summarized below. The laboratory reports associated with the majority of these investigations have been submitted to MassDEP under previous submittals, and are not re-presented in this report.

2.1 Groundwater Sampling

There is no groundwater monitoring well located at the Property. However, the concentrations of chlorinated VOCs detected in groundwater samples collected from monitoring wells MW120S and MW120D, located approximately 20 ft south of the Property in Glen Park, are considered to be representative of groundwater conditions at the Property.

Seventeen groundwater samples have been collected from MW120S, and 17 groundwater samples have been collected from MW120D, between August 2007 and April 2016. The groundwater samples were submitted to Accutest Laboratories (Accutest) of Marlborough, Massachusetts for analysis of VOCs by U.S. Environmental Protection Agency (EPA) Method 8260B. The laboratory testing results for groundwater samples collected from MW120S and MW120D are summarized in Table 1.

One chlorinated VOC, 1,1-dichloroethane (1,1-DCA), was detected twice above laboratory reporting limits (4.3 µg/l in October 2007 and 2.5 µg/l in July 2008) in groundwater samples collected from monitoring well MW120S. Acetone, carbon disulfide, chloroform, and chloromethane were detected at estimated concentrations below the laboratory reporting limits. However, these compounds are not related to the Site. Monitoring well MW120S is a shallow well screened between 5 and 20 ft below ground surface (ft bgs).

Monitoring well MW120D is a bedrock well screened between 28 and 38 ft bgs. The following compounds were detected above laboratory reporting limits in at least one groundwater sample collected from MW120D: Chloromethane, 1,1-DCA, 1,1-dichloroethylene (1,1-DCE), cis-1,2-DCE, methyl tert-butyl ether (MTBE), PCE, TCA, TCE, and vinyl chloride. Naphthalene was also detected at estimated concentrations below laboratory reporting limits. Chloromethane, MTBE and naphthalene are not related to the Site.

2.2 Soil Sampling

Soil samples B120-S3 (4 to 6 ft) and B120-S7 (14 to 16 ft) were collected during the installation of groundwater monitoring well MW120D, located approximately 20 ft south of the Property, and submitted to Accutest for VOC analysis by EPA Method 8260B. Chlorinated VOCs were not detected above laboratory reporting limits in these soil samples. The laboratory testing results for these soil samples are summarized in Table 2.

2.3 Soil Vapor Sampling

Except for two detections of 1,1-DCA (4.3 µg/l and 2.5 µg/l) in MW120S, chlorinated VOCs were not detected above laboratory reporting limits in shallow groundwater near the Property; therefore, soil vapor samples were not collected at the Property. A soil vapor monitoring port was installed in MW120S, and soil vapor samples were collected on August 28, 2007 and October 16, 2007. GEI submitted the samples to Accutest for VOC analysis by EPA Method TO-15 for the following analytes:

- Carbon tetrachloride
- Chloroethane
- 1,1-Dichloroethane
- 1,2-Dichloroethane
- 1,1-Dichloroethylene
- cis-1,2-Dichloroethylene
- trans-1,2-Dichloroethylene
- 1,1,2,2-Tetrachloroethane
- Tetrachloroethylene (PCE)
- 1,1,1-Trichloroethane (TCA)
- 1,1,2-Trichloroethane
- Trichloroethylene (TCE)
- Vinyl Chloride

The VOCs chloroethane, 1,1-DCA, 1,2-DCA, 1,1-DCE, PCE, TCE, and vinyl chloride each were detected above laboratory reporting limits in at least one soil vapor sample from MW120S. 1,2-DCA is not related to the Site. The laboratory testing results are summarized in Table 3.

The soil vapor samples were not collected from beneath the slab of the Property building; however, because the soil vapor sampling locations are approximately 20 ft from the Property, they are an indicator of low soil vapor concentrations in this portion of the Site. Individual chlorinated VOCs detected in the soil vapor were below residential soil vapor screening criteria presented in the MassDEP Guidance "WSC No. 14-435: Interim Final Vapor Intrusion Guidance," dated October 2014 (2014 VI Guidance).

3. Evaluation of Vapor Intrusion Pathway

All pertinent data were reviewed and considered to evaluate the potential for a complete vapor intrusion pathway on the Property. Based on the following lines of evidence, there is no such complete vapor intrusion pathway:

- Residual or connected phase DNAPL has not been detected at or near the Property.
- Except for two detections of 1,1-dichloroethane (1,1-DCA) (4.3 µg/l and 2.5 µg/l) during the 17 sampling rounds since 2007, chlorinated VOCs have not been detected above laboratory reporting limits in shallow groundwater samples collected near the Property (MW120S).
- Chlorinated VOCs have not been detected in soil above laboratory reporting limits near the Property (MW120D).
- Individual chlorinated VOCs detected in the soil vapor samples collected from MW120S were below residential screening criteria in the 2014 VI Guidance. The soil vapor samples were not collected from beneath the slab of the Property building; however, because the soil vapor sampling location is approximately 20 ft from the Property, they are an indicator of low soil vapor concentrations in this portion of the Site.

4. Method 1 Risk Characterization

Five Site-wide Method 3 Risk Characterization Reports were previously prepared for the Site. The July 2008 Phase II/Phase III included a Method 3 Risk Characterization for the Site, prepared by AMEC Earth & Environmental (AMEC) of Westford, Massachusetts. In response to MassDEP comments, AMEC prepared a Supplemental Method 3 Risk Characterization (Supplemental Risk Characterization) in May 2009. The Supplemental Risk Characterization evaluated potential risks using the framework in the July 2008 Method 3 Risk Characterization, including an indoor air Exposure Assessment for each affected residence without an effective Exposure Pathway Mitigation Measure (EPMM). A Revised Supplemental Risk Characterization was prepared to support the IRAC Report. Potential risks presented in the Supplemental Risk Characterization were updated in the Revised Supplemental Risk Characterization to reflect additional data collection and additional EPMMs installed by GEI. An Updated Revised Supplemental Risk Characterization was prepared in April 2011 to respond to a MassDEP Notice of Audit Findings and Notice of Noncompliance for the IRAC Report. An Updated Method 3 Risk Characterization was prepared by ARCADIS U.S., Inc. of Chelmsford, Massachusetts in August 2015 to incorporate updated MassDEP toxicity information for PCE and TCE.

Based on all lines of evidence, there is not a complete vapor intrusion pathway at the Property. Accordingly, a Method 1 Risk Characterization was completed for the Property (6 Reed Court Avenue Risk Characterization) in accordance with 310 CMR 40.0900 to support this Partial Permanent Solution Statement. A Method 1 Risk Characterization evaluates foreseeable Site uses, potential receptors, compounds of potential concern (COPCs), and exposure point concentrations (EPCs), and compares EPCs detected in soil and groundwater to MassDEP-derived standards. If the EPCs in soil and groundwater are less than the applicable Method 1 standards then a condition of NSR of harm to human health, public welfare, and the environment exists. In accordance with 310 CMR 40.0971(5), a separate characterization of the risk of harm to safety was also conducted.

A Method 1 Risk Characterization was appropriate for the Property because: 1) COPCs have not been detected at or near the Property in media other than groundwater; 2) MCP standards exist for the COPCs detected at or near the Property; and 3) compounds considered by MassDEP to bioaccumulate are not present within 2 ft of the ground surface.

4.1 Current and Reasonably Foreseeable Site Activity and Use

Consistent with the requirements of the MCP (310 CMR 40.0923), the 6 Reed Court Risk Characterization considered both current and future uses of the Property. The current use of

the Property is as a residence, and the reasonably conservative foreseeable use of the Property is also residential.

4.2 Potential Human Receptors

Potential human receptors were identified based on current and foreseeable uses of the Property. Current use receptors at the Property are residents. Future use receptors of the Property are future residents and construction workers during potential future excavation/development activities.

4.3 Potential Environmental Receptors

The Property is in an urban area, is fully developed, and would not likely represent a potentially significant terrestrial habitat. Based on the low levels of COPCs in accessible surface soils and the scarcity of open land, the Property does not provide for exposures for potential terrestrial receptors.

The closest surface water bodies are the Mystic River, located approximately 1 mile northeast of the Property, and the Charles River located approximately 1.7 miles south-southeast of the Property. Based on the distance to the nearest aquatic receptors and the current levels of COPCs in groundwater, the transport of COPCs in groundwater to surface water and sediment is not considered to be a significant exposure pathway.

4.4 Summary of Analytical Results

The environmental conditions at the Property have been characterized based on data collected in the immediate vicinity of the Property, as described in Section 2.

4.4.1 Soil

Chlorinated VOCs generally have not been detected in soils beyond the boundaries of the 50 Tufts Street property; therefore, soil samples were not collected at the Property. Chlorinated VOCs were not detected above laboratory reporting limits in the two soil samples collected during the installation of MW120D, located approximately 20 ft south of the Property (Table 2). Consequently, soil at the Property is not considered to be impacted by Site COPCs, and is not evaluated further in this risk characterization.

4.4.2 Groundwater

We reviewed and evaluated groundwater data for use in the Method 1 Risk Characterization to identify potential exposure points and derive EPCs based on the relevant groundwater categories identified for the Property. Groundwater data included in the Method 1 Risk

Characterization are from the two monitoring wells located approximately 20 ft south of the Property, MW120S and MW120D, and are presented in Table 1.

4.4.3 Hot Spot Evaluation

Under the MCP (310 CMR 40.0924), hot spots must be considered as distinct exposure points. A hot spot is defined as a discrete area where the concentrations of OHM are substantially higher than those concentrations in the surrounding area. No "hot spots" have been identified at the Property.

4.5 COPCs

The following compounds were detected above laboratory reporting limits in at least one groundwater sample collected from monitoring wells MW120S and MW120D: Chloromethane, 1,1-DCA, 1,1-DCE, cis-1,2-DCE, MTBE, PCE, TCA, TCE, and vinyl chloride. Acetone, carbon disulfide, and naphthalene were also detected at estimated concentrations that are at or below laboratory reporting limits.

The COPCs at the Site have been limited to certain chlorinated solvents, together with their associated breakdown products. Acetone, carbon disulfide, chloroform, chloromethane, MTBE, and naphthalene have historically been detected at higher concentrations in monitoring wells located several hundred feet away from the 50 Tufts Street property (MW106, MW107, MW120S, and MW120D) than the maximum concentration detected in samples collected from the 50 Tufts Street property. These compounds are not considered to be associated with the releases of OHM at 50 Tufts Street; therefore, they are not COPCs at the Site and are not evaluated further in this risk characterization for the Property.

The COPCs 1,1-DCA, 1,1-DCE, cis-1,2-DCE, PCE, TCA, TCE, and vinyl chloride were detected in at least one sample collected from MW120S or MW120D.

4.6 Soil and Groundwater Categories

This section identifies and documents the applicable soil and groundwater categories, as described in the MCP (310 CMR 40.0930). The soil and groundwater categories are considered general indicators of the potential for exposure to OHM.

4.6.1 Soil Categories

Under the MCP, soil can be classified into one of three categories (S-1, S-2, or S-3). Category S-1 soil represents the highest potential exposure because it assumes unrestricted use of the soil (i.e., residential), whereas category S-3 soil represents the lowest potential for exposure. Residents currently present at the Property are considered to have high frequency

and high intensity contact with soil located outside of the building footprint. Soil beneath the building is considered to be isolated. Therefore, soil located from 0 to 15 ft bgs outside the building footprint is categorized as S-1, and soil located beyond 15 ft deep or beneath the building footprint is categorized as S-3.

For purposes of this risk characterization, all soil from 0 to 15 ft bgs at the Property is characterized as S-1. However, soil at the Property is not considered to be impacted by Site COPCs, and was not evaluated further in this risk characterization.

4.6.2 Groundwater Categories

The MCP identifies three groundwater categories which correspond to the following three distinct types of exposures:

- **Groundwater Category GW-1** applies to groundwater assumed to be a current or future source of drinking water.
- **Groundwater Category GW-2** applies to groundwater considered to be a potential source of vapors that could migrate through the soil and concentrate in indoor air of existing, occupied buildings. GW-2 is defined as groundwater located within 30 ft of an existing or planned building or structure that is or will be occupied, and the average annual depth to groundwater in that area is 15 ft or less.
- **Groundwater Category GW-3** applies to groundwater that is assumed to discharge to surface water. All groundwater in the Commonwealth is classified as GW-3.

Because the exposures are not necessarily related to each other, they are not mutually exclusive. Therefore, more than one category may be applicable to a site and/or different areas of a site.

Groundwater beneath the Property is not located within a current or potential drinking water source area. There is an occupied building at the Property, and the depth to groundwater is unknown; however, the depth to groundwater in MW120S (located approximately 20 ft south of the Property) ranges between 3 to 5 ft bgs. Therefore, we have considered depth to groundwater at the Property to be less than 15 ft bgs. Based on this information, the applicable groundwater categories for the Property are GW-2 and GW-3.

4.7 Identification of EPCs

The MCP requires that the estimation of EPCs be representative of actual and foreseeable exposures.

4.7.1 Groundwater EPCs

For a Method 1 Risk Characterization, and in accordance with 310 CMR 40.0924, "the groundwater EPC shall be the groundwater resource itself, as measured at each wellhead…" Therefore, the maximum groundwater concentrations for each COPC in monitoring wells MW120S and MW120D were identified as EPCs (Table 4). The locations of groundwater monitoring wells MW120S and MW120D are shown in Fig. 2.

4.8 Comparison of EPCs to MCP Standards

A condition of NSR of harm to health, public welfare, and the environment exists if the EPCs are less than the lowest applicable MCP soil or groundwater standard.

For groundwater, the EPCs were identified and compared to applicable Method 1 GW-2 and GW-3 groundwater standards (Table 4). Based on the depth from which the groundwater samples were collected from each monitoring well (5 to 20 ft bgs at MW120S and 28 to 38 ft bgs at MW120D), the applicable Method 1 standards for comparison to MW120S are the GW-2 and GW-3 standards, and the applicable Method 1 standards for comparison to MW120D are the GW-3 standards. The results of this comparison show that the groundwater EPCs for all COPCs are below the applicable Method 1 standards. Therefore, a condition of NSR of harm to health, public welfare and the environment exists at the Property.

4.9 Characterization of Risk of Harm to Safety

In accordance with the MCP (310 CMR 40.0971(5)), a separate characterization of risk of harm to safety was also conducted in accordance with 310 CMR 40.0960. There are no rusted or corroded drums or containers, open pits, lagoons, or other dangerous structures at the Property; there is no threat of fire or explosion at the Property; and there are no uncontained materials which exhibit the characteristics of corrosivity, reactivity, or flammability at the Property. Therefore, a condition of NSR of harm to safety exists at the Property.

4.10 Conclusions

The Method 1 Risk Characterization for the Property concluded:

- A condition of NSR to health, safety, public welfare, and the environment exists for all receptors.
- No remedial actions are required.
- An Activity and Use Limitation (AUL) is not required to maintain a condition of NSR.

Therefore, no further action is required at the Property.

5. Representativeness Evaluation and Data Usability Assessment

The purpose of a Representativeness Evaluation and Data Usability Assessment (REDUA) is to evaluate the extent to which a data set meets specific site characterization and data usability objectives. The majority of the data on which this Partial Permanent Solution Statement relies was evaluated under the REDUA presented in the Phase II/III, which was submitted in July 2008. However, additional groundwater samples have been collected since the Phase II/III, and the analytical results for some of those samples are included in the data set for this Partial Permanent Solution Statement. A REDUA for these additional data are presented below. The REDUA was performed in general accordance with MassDEP Policy #WSC-07-350, "MCP Representativeness Evaluations and Data Usability Assessments," dated September 19, 2007.

5.1 Conceptual Site Model

The CSM is presented in Section 1.6.

5.2 Field and Screening Data

Field data include physical parameter measurements made during groundwater sampling (e.g., pH, temperature, conductivity, dissolved oxygen, etc.). Field and screening data were reviewed with the associated laboratory testing reports as part of the data quality assessment.

5.3 Sampling Rationale, Distribution, and Data Completeness

Environmental samples were submitted for chlorinated VOC testing consistent with the Site history and types of chemicals stored and used at the Site. To characterize the groundwater at the Property, GEI relied on groundwater monitoring wells MW120S and MW120D, located approximately 20 ft south of the Property. Over an approximately 9-year period, 17 groundwater samples have been collected from MW120S, and 17 groundwater samples have been collected from monitoring well MW120D.

Except for two detections of 1,1-DCA (4.3 µg/l and 2.5 µg/l) in MW120S, chlorinated VOCs were not detected above laboratory reporting limits in shallow groundwater near the Property; therefore, soil vapor samples were not collected at the Property.

No data associated with conditions at the Property were rejected for quality assurance/quality control reasons. Data gaps related to sample distribution or data quality were not identified.

Therefore, the data set is considered 100% complete. Inconsistent data was not identified. Field screening results, and observations such as visual and olfactory observations, were consistent with laboratory testing results. There is little uncertainty associated with the data used to support this Partial Permanent Solution Statement given the number of samples collected and the locations at which they were collected. All data collected were considered representative.

5.4 Data Usability Assessment

Laboratory testing data used to support this Partial Permanent Solution Statement were generated pursuant to the MassDEP Compendium of Analytical Methods (CAM) and 310 CMR 40.1056 and meet the criteria for "Presumptive Certainty" as identified in the MassDEP Document "WSC No. 10-320: Compendium of Quality Control Requirements and Performance Standards for Selected Analytical Protocols," dated July 1, 2010. These data also are consistent with our field observations, are representative of conditions that exist or existed at the Property, and are of a level of precision and accuracy commensurate with the preparation of this Partial Permanent Solution Statement.

5.5 Data Usability Criteria

The Precision Accuracy Representativeness Completeness Comparability and Sensitivity (PARCCS) parameters of the data were evaluated as part of field procedures, laboratories' analytical protocols, and GEI's in-house data review and validation process. The following groundwater data for MW120S (for COPCs) obtained since the Phase II/III were qualified as being estimated by the laboratory:

- Concentration of PCE in October 2008.
- Concentrations of 1,1-DCA in July 2009 and April 2012.

The following groundwater data for MW120D (for COPCs) obtained since the Phase II/III were qualified as being estimated by the laboratory:

- Concentrations of 1,1-DCA and 1,1-DCE in October 2009.
- Concentrations of cis-1,2-DCE in October 2009, April 2015 and April 2016.
- Concentrations of vinyl chloride in July 2009 and April 2015.

These analytical results were considered sufficiently representative of groundwater conditions and were included in the data set used to support this Partial Permanent Solution Statement.

5.6 Statement of Suitability

In summary, the data set relied upon in this Partial Permanent Solution Statement to characterize the conditions at the Property and perform a risk characterization is scientifically valid and defensible. It is of sufficient accuracy, precision, and completeness. In addition, the data set is representative of the spatial and temporal distribution of sampling points.

6. Partial Permanent Solution Statement

Based on the results of the Phase II/III prepared for the Site, and the 6 Reed Court Risk Characterization, it is the LSP's opinion that a Partial Permanent Solution Statement is appropriate for the Property because:

- No Significant Risk: A condition of NSR to human health, safety, public welfare, and the environment exists for all receptors with No Conditions at the Property, and no remedial actions are required.
- Source Elimination and Control: There are no unpermitted releases of OHM at the Site, and the sources of OHM at the Site are eliminated to the extent feasible and are controlled.
- Migration Control: The groundwater and soil vapor plumes at the Site are stable.
- NAPL: Visible NAPL has not been observed at the Site, and any DNAPL that may be present is not migrating and exists in a stable configuration. The Phase III for the Site demonstrated that it is not feasible to eliminate DNAPL.
- An AUL is not required to maintain a condition of NSR at the Property.

This Partial Permanent Solution only applies to the Property, which is a portion of the disposal site, as shown on Fig. 2.

6.1 Operation, Maintenance, and/or Monitoring

No operation, maintenance, and/or monitoring are required at the Property.

7. Limitations

The conclusions provided by GEI in this report are based solely on the information reported in this document. Additional information which was not available to GEI may result in a modification of the conclusions stated above. This report has been prepared in accordance with generally accepted hydrogeological practices. In the event that a MassDEP audit is conducted, it is the responsibility of UniFirst Corporation, and not GEI, to respond to the MassDEP Notice of Audit Findings. No warranty, expressed or implied, is made.

GEI Consultants

Geotechnical
Environmental and
Water Resources
Engineering

Tables

Table 1. Chemical Testing Results - Groundwater
Partial Permanent Solution Statement
6 Reed Court
Somerville, Massachusetts

Sample Location:			MW120S															
Sample Name:			MW120S	MW120S	MW120S	MW1120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S	MW120S
Well Screen Interval (ft bgs):			5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20	5 to 20
Sample Date:			8/22/07	10/12/07	1/15/08	4/16/08	7/15/08	10/22/08	1/13/09	4/14/09	7/15/09	10/15/09	4/13/10	4/22/11	4/16/12	4/23/13	5/1/14	4/3/15	4/28/16
Collected By:			GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI
Analyte	**Method**	**Units**																	
Volatile Organic Compounds (VOCs)																			
Acetone	8260	µg/l	< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	4.2 J K-	< 10	< 10	< 10	9.3 J
Benzene			< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50
Bromodichloromethene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
2-Butanone (MEK)			< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5 0	< 5 0	< 5.0	< 5.0	< 5.0
Carbon disulfide			0.56 J J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5 0	< 5 0	< 5.0	< 5.0
Carbon tetrechloride			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1 0
Chlorobenzene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chloroethene			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Chloroform			1.9 J+	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chloromethene			10.3 J+	< 2.0	< 2.0	< 2.0 J+	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2 0	< 2.0	< 2.0	< 2 0	< 2.0
1,4-Dichlorobenzene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1-Dichloroethane			1.1 J+	4.3	< 1.0	< 1.0	2.5	< 1.0	< 1.0	< 1.0	0.36 J	< 1.0	< 1.0	< 1.0	0.52 J	< 1.0	< 1.0	< 1.0	< 1 0
1,2-Dichloroethane			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1-Dichloroethylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1 0	< 1.0	< 1.0	< 1.0
cis-1,2-Dichloroethylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1 0
trens-1,2-Dichloroethylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1 0
1,2-Dichloropropene			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2 0	< 2.0
1,4-Dioxane			< 25	< 25	< 25	< 25	< 25	< 25	< 25 J+	< 25 J+	< 25	< 25	< 25	< 25	< 25	< 50	< 25	< 25	< 25
Ethylbenzene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1 0
Hexachlorobutadiene			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5 0	< 5.0	< 5 0
2-Hexanone			< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5 0	< 5.0
4-Isopropyltoluene			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5 0	< 5 0	< 5 0	< 5.0
Methyl tert-butyl ether			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0 K-	< 1.0	< 1.0	< 1.0
Methylene chloride			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Naphthalene			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Tert-emyl methyl ether			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0 J+	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
1,1,1,2-Tetrachloroethane			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5 0	< 5.0	<1.0	<1.0
Tetrechloroethylene (PCE)			< 1.0	< 1.0	0.97 J	< 1.0	< 1.0	0.71 J	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1 0
Tetrahydrofuran			< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10 J+	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10
Toluene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1,1-Trichloroethene (TCA)			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1,2-Trichloroethene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Trichloroethylene (TCE)			< 1.0	< 1.0	0.39 J	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Vinyl chloride			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
m,p-Xylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
o-Xylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Total Xylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

General Notes:

1. Analytes detected in at least one sample are reported here. For a complete list of analytes refer to the laboretory data reporte.
2. ft bgs = feet below ground surface.
3. µg/l = micrograms per liter.
4. "< " = The analyte was not detected et a concentration ebove the specified reporting limit.

Qualifying Notes:

J The reported result is below the laboratory reporting limit and is estimated.
J+ The reported result is estimated
K- The result has a low bies due to blank epike or laboratory control sample recovery below lower control limits.

Table 1. Chemical Testing Results - Groundwater
Partial Permanent Solution Statement
8 Reed Court
Somerville, Massachusetts

Sample Location:			MW120D																
Sample Name:			MW120D	MW120D	MW120D	MW1120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D	MW120D
Well Screen Interval (ft bgs):			28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38	28 to 38
Sample Date:			8/22/07	10/12/07	1/17/08	4/16/08	7/15/08	10/22/08	1/13/09	4/14/09	7/15/09	10/15/09	4/13/10	4/22/11	4/16/12	4/23/13	5/1/14	4/3/15	4/28/18
Collected By:			GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI	GEI
Analyte	**Method**	**Units**																	
Volatile Organic Compounds (VOCs)																			
Acetone	8260	µg/l	< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0 K-	< 10	< 10	< 10	< 10
Benzene			< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50
Bromodichloromethane			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
2-Butanone (MEK)			< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Carbon disulfide			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Carbon tetrachloride			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chlorobenzene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chloroethane			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Chloroform			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Chloromethane			12.0 J+	< 2.0	< 2.0	< 2.0 J+	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	0.85 J	< 2.0	< 2.0	< 2.0
1,4-Dichlorobenzene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1-Dichloroethane			23.0 J+	26.0	23.2	30.8	29.5	21.8	21.4	20.9	18.4	31.1 J+	25.1	23.1	17.0	15.8	18.2	18.2	11.8
1,2-Dichloroethane			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1-Dichloroethylene			15.8 J+	16.9	14.3	17.8	22.0	18.4	16.7	16.9	14.1	24.7 J+	19.4	23.8	15.5	14.8	18.7	18.8	8.2
cis-1,2-Dichloroethylene			0.70 J J+	< 1.0	1.7	1.9	1.9	1.8	0.70 J	1.8	1.5	1.8 J+	1.7	2.4	1.4	1.1	< 1.0	0.95 J	0.84 J
trans-1,2-Dichloroethylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,2-Dichloropropane			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
1,4-Dioxane			< 25	< 25	< 25 J+	< 25	< 25	< 25	< 25 J+	< 25 J+	< 25	< 25	< 25	< 25	< 25	< 50	< 25	< 25	< 25
Ethylbenzene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Hexachlorobutadiene			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
2-Hexanone			< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
4-Isopropyltoluene			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Methyl tert-butyl ether			8.8 J+	3.9	3.2	4.2	3.8	8.6	2.8	2.4	2.0	7.5	2.2	2.2	1.4	7.1 K-	0.76 J	1.1	< 1.0
Methylene chloride			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Naphthalene			< 5.0	< 5.0	< 5.0	0.68 J	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0 J+	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Tert-amyl methyl ether			< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0 J+	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
1,1,1,2-Tetrachloroethane			< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	<1.0	<1.0
Tetrachloroethylene (PCE)			93.5 J+	120	113	131	103	116	84.2	114	99.3	95.0	95.9	75.0	78.5	72.0	66.4	52.9	40.4
Tetrahydrofuran			< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10 J+	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10	< 10
Toluene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
1,1,1-Trichloroethane (TCA)			10.3 J+	4.3	3.2	< 1.0	3.9	6.4	2.8	3.7	2.5	3.3	3.5	4.3	2.0	2.6	1.7	2.1	1.1
1,1,2-Trichloroethane			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Trichloroethylene (TCE)			32.8 J+	40.1	34.7	43.4	38.7	33.2	30.4	33.8	32.0	33.1	34.8	28.3	28.1	23.8	22.1	21.4	15.7
Vinyl chloride			< 1.0	0.38 J	0.35 J	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	0.43 J	< 1.0	< 1.0	1.6	< 1.0	< 1.0	< 1.0	0.89 J	< 1.0
m,p-Xylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
o-Xylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Total Xylene			< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0

General Notes:

1. Analytes detected in at least one sample ere reported here. For a complete list of analytes refer to the laboratory data reports.
2. ft bgs = feet below ground surface.
3. µg/l = micrograms per liter.
4. "< " = The analyte was not detected at a concentration above the specified reporting limit.

Qualifying Notes:

J The reported result is below the laboratory reporting limit and is estimated
J+ The reported result is estimated.
K- The result has e low bias due to blank spike or laboratory control sample recovery below lower control limits.

Table 2. Chemical Testing Results - Soil
Partial Permanent Solution Statement
6 Reed Court
Somerville, Massachusetts

			Location Name:	MW120D	MW120D
			Sample Name:	B120-S3	B120-S7
			Sample Depth (ft):	4 to 6	14 to 16
			Sample Date:	8/8/07	8/8/07
Analyte	**Method**	**Units**			
Volatile Organic Compounds (VOCs)	8260	mg/kg			
Carbon tetrachloride				< 0.1	< 0.12
Chloroethane				< 0.25	< 0.29
1,1-Dichloroethane				< 0.1	< 0.12
1,1-Dichloroethylene				< 0.1	< 0.12
cis-1,2-Dichloroethylene				< 0.1	< 0.12
trans-1,2-Dichloroethylene				< 0.1	< 0.12
1,1,2,2-Tetrachloroethane				< 0.1	< 0.12
Tetrachloroethylene (PCE)				< 0.1	< 0.12
1,1,1-Trichloroethane (TCA)				< 0.1	< 0.12
1,1,2-Trichloroethane				< 0.1	< 0.12
Trichloroethylene (TCE)				< 0.1	< 0.12
Vinyl chloride				< 0.1	< 0.12

General Notes:

1. Only analytical results for compounds of potential concern (COPCs) are presented. For a complete list of analytes refer to the laboratory data reports.
2. mg/kg = milligrams per kilogram.
3. ft = feet.
4. "<" = The analyte was not detected at a concentration above the specified laboratory reporting limit.

Table 3. Chemical Testing Results - Subsurface Soil Vapor
Partial Permanent Solution Statement
6 Reed Court
Somerville, Massachusetts

		Location Name:	MW120S			
		Sample Name:	SG-120S		MW120S-SG	
		Sample Date:	8/28/2007		10/16/2007	
		Units:	µg/m^3	ppbv	µg/m^3	ppbv
Analyte	**Method**	**MassDEP Residential Sub-Slab Soil Gas Screening Values (µg/m^3)**				
Volatile Organic Compounds (VOCs)	TO-15					
Carbon tetrachloride		38	0.62 J	0.098 J	< 1.3	< 0.20
Chloroethane		NS	0.58	0.22	1.0	0.38
1,1-Dichloroethane		56	51.8	12.8	48.2	11.9
1,2-Dichloroethane[6]		6.3	0.81	0.20	0.40 J	0.098 J
1,1-Dichloroethylene		56	1.1	0.29	0.75 J	0.19 J
Tetrachloroethylene (PCE)		98	18	2.7	< 1.4	< 0.20
1,1,1-Trichloroethane (TCA)		210	0.55 J	0.10 J	< 1.1	< 0.20
Trichloroethylene (TCE)		56	4.8	0.90	0.86 J	0.16 J
Vinyl chloride		19	0.51	0.20	0.74	0.29

General Notes:

1. Analytes detected in at least one sample are reported here. For a complete list of analytes refer to the laboratory data reports.
2. µg/m^3 = micrograms per cubic meter.
3. ppbv = parts per billion by volume.
4. "<" = The analyte was not detected at a concentration above the specified laboratory reporting limit.
5. Residential Screening Values are cited from "Public Review Draft Vapor Intrusion Guidance" from the Massachusetts Department of Environmental Protection dated October 2014.
6. Analyte is not associated with the release of chlorinated VOCs at the Site, and is therefore not a compound of potential concern (COPC). Refer to Section 4.5 of this Partial Permanent Solution Statement report.
7. NS = No known screening value listed.

Qualifying Notes:

J The reported result is below the laboratory reporting limit and is estimated.

Table 4. Exposure Point Concentrations - Groundwater
Partial Permanent Solution Statement
6 Reed Court
Somerville, Massachusetts

			Sample Location:		MW120S	MW120D
			Method 1 Standards		Exposure Point Concentrations[3]	Exposure Point Concentrations[3]
Analyte	Method	Units	GW-2	GW-3		
Volatile Organic Compounds (VOCs)	8260B	µg/l				
1,1-Dichloroethane			1,000	20,000	4.3	31.1
1,1-Dichloroethylene			80	30,000	< 1.0	24.7
cis-1,2-Dichloroethylene			100	50,000	< 1.0	2.4
Tetrachloroethylene (PCE)			50	30,000	0.97 J	131
1,1,1-Trichloroethane (TCA)			4,000	20,000	< 1.0	10.3
Trichloroethylene (TCE)			30	5,000	0.39 J	43.4
Vinyl chloride			2	50,000	< 1.0	1.6

General Notes:

1. µg/l = micrograms per liter.
2. "<" = The analyte was not detected at a concentration above the specified laboratory reporting limit.
3. The exposure point concentrations are the maximum VOC concentration detected at each monitoring well.
4. Based on the depth from which the groundwater samples were collected from each monitoring well, the applicable Method 1 Standard for comparison to MW120S is the GW-2 and GW-3 standards, and the applicable Method 1 standards for comparison to MW120D is the GW-3 standards.

Qualifying Note:

J The reported result is below the laboratory reporting limit and is estimated.

GEI Consultants

Consulting
Engineers and
Scientists

Figures

This Image provided by MassGIS is taken from
U.S.G.S. Topographic 7.5 X 15 Minute Series
Boston North, MA Quadrangle, 1985.
Datum is National Geodetic Vertical Datum (NGVD 1929).
Contour Interval is 3 Meters.

Partial Permanent Solution Statement 50 Tufts Street Somerville, Massachusetts	GEI Consultants	SITE LOCATION MAP
UniFirst Corporation Wilmington, Massachusetts	Project 04516-3	June 2016 Fig. 1

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LEGEND:

- MONITORING WELL WITH SOIL VAPOR SAMPLE PORT INSTALLED BY GEI, JANUARY 2007 - JANUARY 2008
- MONITORING WELL BY KLEINFELDER, SEPTEMBER 2012, MARCH 2014, AND APRIL 2014
- MONITORING WELL INSTALLED BY SANBORN HEAD ASSOCIATES, 2002
- MONITORING WELL INSTALLED BY GEOINSIGHT, JUNE 2004
- SOIL BORING ADVANCED BY GEOINSIGHT, AUGUST 2004
- MONITORING WELL INSTALLED BY GEI, MAY 2006
- DRIVEN POINT MONITORING WELL INSTALLED BY MADEP, MAY 2007
- MONITORING WELL INSTALLED PREVIOUSLY, DATE UNKNOWN
- PREVIOUSLY INSTALLED IRRIGATION WELL
- ▲ SOIL SAMPLE COLLECTED PRIOR TO MONITORING WELL INSTALLATION
- 84 STREET ADDRESS

MBTA = MASSACHUSETTS BAY TRANSPORTATION AUTHORITY

- DISPOSAL SITE BOUNDARY (DASHED WHERE INFERRED)
- EXTENT OF PCE CONCENTRATION IN SHALLOW GROUNDWATER GREATER THAN OR EQUAL TO 50 MICROGRAMS PER LITER (µg/l)
- PORTION OF SITE SUBJECT TO THE PERMANENT SOLUTION WITHOUT CONDITIONS

GENERAL NOTES:

1. HORIZONTAL CONTROL FOR THIS PLAN WAS ESTABLISHED BY GPS AND IS BASED ON THE NORTH AMERICAN DATUM OF 1983.
2. STREET AND PROPERTY LINES BASED ON SOMERVILLE ASSESSORS' MAPS AND ARE BEST FIT RELATIVE TO THE LOCATION OF THE 50 TUFTS ST. BUILDING.
3. MONITORING WELL LOCATIONS WERE ESTABLISHED BASED ON THE GROUND SURVEYS BY BSC GROUP, INC.
4. GEI OBSERVED ABANDONMENT OF SH-MW1 AND SH-1 THROUGH SH-5 IN 2007.

Partial Permanent Solution Statement
50 Tufts Street
Somerville, Massachusetts

UniFirst Corporation
Wilmington, Massachusetts

GEI Consultants

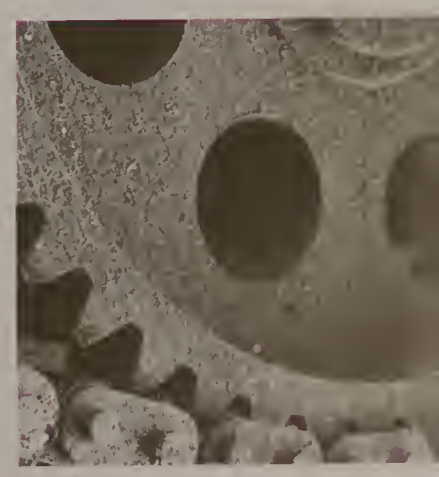
6 REED COURT -
Portion of Disposal Site
Subject to Permanent Solution

Project 04516-3 | June 2016 | Fig. 2

N:\04516\#Drafting\04516-3\Partial RAOs\045160-3-RAOP - 6 Reed Court 02

GEI Consultants

Consulting
Engineers and
Scientists



Appendix A

Copy of MassDEP Form (BWSC-104) "Permanent and Temporary Solution Statement"

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 104

PERMANENT AND TEMPORARY SOLUTION STATEMENT

Pursuant to 310 CMR 40.1000 (Subpart J)

Release Tracking Number
3 - 23246

For sites with multiple RTNs, enter the Primary RTN above.

A. SITE LOCATION:

1. Site Name/Location Aid: 50 TUFTS ST & PROP ACROSS THE ST

2. Street Address: 50 TUFTS ST

3. City/Town: SOMERVILLE 4. ZIP Code: 021454129

5. Coordinates: a. Latitude: N 42.38234 b. Longitude: W 71.08880

☑ 6. Check here if the disposal site that is the source of the release is Tier Classified. Check the current Tier Classification Category:

☐ a. Tier I ☐ b. Tier ID ☑ c. Tier II

B. THIS FORM IS BEING USED TO: (check all that apply)

1. List Submittal Date of the Permanent or Temporary Solution Statement, or RAO Statement (if previously submitted): _____ mm/dd/yyyy

☐ 2. Submit a **Permanent or Temporary Solution Statement**

☐ a. Check here if this Permanent or Temporary Solution Statement covers additional Release Tracking Numbers (RTNs). RTNs that have been previously linked to a Tier Classified Primary RTN do not need to be listed here.

b. Provide the additional Release Tracking Number(s) covered by this Permanent or Temporary Solution Statement. ☐ - ☐ ☐ - ☐

☐ 3. Submit a **Revised Permanent or Temporary Solution Statement** (or revised RAO Statement)

☐ a. Check here if this Revised Permanent or Temporary Solution Statement covers additional Release Tracking Numbers (RTNs), not listed on the Permanent or Temporary Solution Statement or previously submitted Revised Permanent or Temporary Solution Statements. RTNs that have been previously linked to a Tier Classified Primary RTN do not need to be listed here.

b. Provide the additional Release Tracking Number(s) covered by this Permanent or Temporary Solution Statement. ☐ - ☐ ☐ - ☐

☑ 4. Submit a **Permanent or Temporary Solution Partial Statement**

Check above box, if any Response Actions remain to be taken to address conditions associated with this disposal site having the Primary RTN listed in the header section of this transmittal form. This Permanent or Temporary Solution Statement will record only a Permanent or Temporary Solution-Partial Statement for that RTN. A final Permanent or Temporary Solution Statement will need to be submitted that references all Permanent or Temporary Solution-Partial Statements and, if applicable, covers any remaining conditions not covered by the Permanent or Temporary Solution-Partial Statements.

Also, specify if you are an Eligible Person or Tenant pursuant to M.G.L. c. 21 s.2, and have no further obligation to conduct response actions on the remaining portion(s) of the disposal site:

☐ a. Eligible Person ☐ b. Eligible Tenant

☐ 5. Submit a **Revised Permanent or Temporary Solution Partial Statement** (or revised RAO-Partial Statement)

☐ 6. Submit an optional **Phase I Completion Statement** supporting the Permanent or Temporary Solution Statement

☐ 7. Submit a **Periodic Review Opinion evaluating the status of a Temporary Solution,** as specified in 310 CMR 40.1051 (Section F is optional)

☐ 8. Submit a **Retraction** of a previously submitted **Permanent or Temporary Solution Statement** (or RAO Statement) (Sections E & F are not required)

(All sections of this transmittal form must be filled out unless otherwise noted above)

C. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply; for volumes, list cumulative amounts)

- ☑ 1. Assessment and/or Monitoring Only
- ☐ 2. Temporary Covers or Caps
- ☐ 3. Deployment of Absorbent or Containment Materials
- ☐ 4. Treatment of Water Supplies
- ☐ 5. Structure Venting System/HVAC Modification System
- ☐ 6. Engineered Barrier
- ☐ 7. Product or NAPL Recovery
- ☐ 8. Fencing and Sign Posting
- ☐ 9. Groundwater Treatment Systems
- ☐ 10. Soil Vapor Extraction
- ☐ 11. Remedial Additives
- ☐ 12. Air Sparging
- ☐ 13. Active Exposure Pathway Mitigation System
- ☐ 14. Passive Exposure Pathway Mitigation System
- ☐ 15. Monitored Natural Attenuation
- ☐ 16. In-Situ Chemical Oxidation
- ☐ 17. Removal of Contaminated Soils
- ☐ a. Re-use, Recycling or Treatment — ☐ i. On Site — Estimated volume in cubic yards _____
  ☐ ii. Off Site — Estimated volume in cubic yards _____

iia. Facility Name: _____ Town: _____ State: _____

iib. Facility Name: _____ Town: _____ State: _____

iii. Describe:

_____

- ☐ b. Landfill
  - ☐ i. Cover — Estimated volume in cubic yards _____
    Facility Name: _____ Town: _____ State: _____
  - ☐ ii. Disposal — Estimated volume in cubic yards _____
    Facility Name: _____ Town: _____ State: _____
- ☐ 18. Removal of Drums, Tanks or Containers:
  a. Describe Quantity and Amount:

  _____
  b. Facility Name: _____ Town: _____ State: _____
  c. Facility Name: _____ Town: _____ State: _____
- ☐ 19. Removal of Other Contaminated Media:
  a. Specify Type and Volume:

  _____
  b. Facility Name: _____ Town: _____ State: _____
  c. Facility Name: _____ Town: _____ State: _____

C. DESCRIPTION OF RESPONSE ACTIONS (cont.): (check all that apply; for volumes, list cumulative amounts)

☐ 20. Other Response Actions:

Describe:

☐ 21. Use of Innovative Technologies:

Describe:

D. SITE USE:

1. Are the response actions that are the subject of this submittal associated with the *redevelopment, reuse* or the *major expansion of the current use* of property(ies) impacted by the presence of oil and/or hazardous materials?

☐ a. Yes ☑ b. No ☐ c. Don't know

2. Is the property a *vacant or under-utilized commercial or industrial* property ("a brownfield property")?

☐ a. Yes ☑ b. No ☐ c. Don't know

3. Will funds from a state or federal brownfield incentive program be used on one or more of the property(ies) within the disposal site?

☐ a. Yes ☑ b. No ☐ c. Don't know If Yes, identify program(s):

4. Has a Covenant Not to Sue been obtained or sought?

☐ a. Yes ☑ b. No ☐ c. Don't know

5. Check all applicable categories that apply to the person making this submittal:

☐ a. Redevelopment Agency or Authority
☐ b. Community Development Corporation
☐ c. Economic Development and Industrial Corporation
☐ d. Private Developer
☐ e. Fiduciary
☐ f. Secured Lender
☐ g. Municipality
☐ h. Potential Buyer (non-owner)
☑ i. Other, describe: OTHER PRPS

This data will be used by MassDEP for information purposes only, and does not represent or create any legal commitment, obligation or liability on the part of the party or person providing this data to MassDEP.

E. PERMANENT OR TEMPORARY SOLUTION CATEGORY:

Specify the category of Solution that applies to the Disposal Site, or Site of the Threat of Release. Select either **1, 2, or 3.**

☑ **1. Permanent Solution with No Conditions** (check one)

☐ a. A threat of release has been eliminated.

☐ b. All contamination has been reduced to Natural Background levels.

☑ c. A condition of No Significant Risk exists or has been achieved with no Activity and Use Limitation or other limitations, assumptions, or conditions (310 CMR 40.1013).

E. PERMANENT OR TEMPORARY SOLUTION CATEGORY (cont.):

☐ **2. Permanent Solution with Conditions** (check a and/or b):

☐ a. **An AUL has been implemented** pursuant to 310 CMR 1012(2) (check one)

☐ i. Required pursuant to 310 40.1012(2)

☐ ii. Optionally implemented pursuant to 310 40.1012(3)

☐ b. **Limitations or conditions apply** pursuant to 310 CMR 40.1013 (check all that apply):

☐ i. Gardening Best Management Practices (BMPs) for non-commercial gardening in a residential setting

☐ ii. Concentrations of Oil and Hazardous Material consistent with Anthropogenic Background

☐ iii. Residual contamination in a Public or Railroad Right-of-Way

☐ iv. Groundwater contamination would exceed GW-2 Standards except for the absence of an occupied building or structure

☐ **3. Temporary Solution** (check one)

☐ a. Response actions to achieve a Permanent Solution **are not currently feasible**

☐ b. Response actions to achieve a Permanent Solution **are feasible** and are being continued toward a Permanent Solution

F. PERMANENT AND TEMPORARY SOLUTION INFORMATION:

1. Specify the Risk Characterization Method(s) used to achieve the Permanent or Temporary Solution, described above:

☑ a. Method 1 ☐ b. Method 2 ☐ c. Method 3

☐ d. Method Not Applicable-Contamination reduced to or consistent with background, or Threat of Release abated

2. Specify all Soil Category(ies) applicable. More than one Soil Category may apply at a Site. Be sure to check off all **APPLICABLE** categories:

☐ a. S-1/GW-1 ☐ d. S-2/GW-1 ☐ g. S-3/GW-1 ☐ j. Not Applicable

☑ b. S-1/GW-2 ☐ e. S-2/GW-2 ☑ h. S-3/GW-2

☑ c. S-1/GW-3 ☐ f. S-2/GW-3 ☑ i. S-3/GW-3

3. Specify all Groundwater Category(ies) impacted. A site may impact more than one Groundwater Category. Be sure to check off all **IMPACTED** categories:

☐ a. GW-1 ☑ b. GW-2 ☑ c. GW-3 ☐ d. No Groundwater Impacted

☐ 4. Check here if the risk assessment includes any changes to the groundwater category pursuant to 310 CMR 40.0932(5)(a) through (e). Check all conditions that apply:

☐ a. An InterimWellhead Protection Area does not apply based on a hydrogeologic evaluation (310 CMR 40.0932(5)(a))

☐ b. Groundwater was determined not to be in a Potentially Productive Aquifer or is not feasible to be developed as a drinking water supply (310 CMR 40.0932(5)(b))

☐ c. A Non-Potential DrinkingWater Source Area determination was made (310 CMR 40.0932(5)(c))

☐ d. Existing private wells were permanently closed (310 CMR 40.0932(5)(d))

☐ e. Groundwater is located within a Zone A, but is not hydrogeologically connected to a drinking water supply (310 CMR 40.0932(5)(e))

☐ 5. Check here if the Permanent or Temporary Solution supports a finding of No Significant Risk for petroleum in a GW-1 area pursuant to 310 CMR 40.0924(2)(b)3.

F. PERMANENT AND TEMPORARY SOLUTION INFORMATION (cont.):

6. Specify whether remediation was conducted:

☐ a. Check here if soil remediation was conducted.

☐ b. Check here if groundwater remediation was conducted.

☐ c. Check here if other remediation was conducted.
Specify:

7. Specify whether the analytical data used to support the Permanent or Temporary Solution used the Compendium of Analytical Methods (CAM):

☑ a. CAM used to support all analytical data.

☐ b. CAM used to support some of the analytical data.

☐ c. CAM not used.

☑ 8. Check here to indicate that the Permanent or Temporary Solution Statement includes a Data Usability Assessment and Data Representativeness Evaluation pursuant to 310 CMR 40.1056.

9. Estimate the number of acres this Permanent or Temporary Solution Statement applies to: 0.08

G. LSP SIGNATURE AND STAMP:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and 309 CMR4.03(2), and (iii) the provisions of 309 CMR 4.03(3), to the best of my knowledge, information and belief,

> *if Section B indicates that either a* ***Permanent or Temporary Solution Statement, Phase I Completion Statement and/or Periodic Review Opinion*** *is being provided,* the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) comply(ies) with the identified provisions of all orders, permits, and approvals identified in this submittal.

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

1. LSP#: 9719

2. First Name: ILEEN S 3. Last Name: GLADSTONE

4. Telephone: 781-721-4012 5. Ext.: 6. Email: igladstone@geiconsultants.com

7. Signature: ILEEN S GLADSTONE

8. Date: 6/7/2016
mm/dd/yyyy

9. LSP Stamp:

H. PERSON MAKING SUBMITTAL:

1. Check all that apply: ☐ a. change in contact name ☐ b. change of address ☐ c. change in the person undertaking response actions

2. Name of Organization: UNIFIRST CORPORATION

3. Contact First Name: TIMOTHY 4. Last Name: COSGRAVE

5. Street: 68 JONSPIN RD 6. Title: DIRECTOR EH&S

7. City/Town: WILMINGTON 8. State: MA 9. ZIP Code: 018871090

10. Telephone: 978-658-8888 11. Ext.: 4332 12. Email:

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 104

PERMANENT AND TEMPORARY SOLUTION STATEMENT
Pursuant to 310 CMR 40.1000 (Subpart J)

Release Tracking Number
3 - 23246

For sites with multiple RTNs, enter the Primary RTN above.

I. RELATIONSHIP TO RELEASE OR THREAT OF RELEASE OF PERSON MAKING SUBMITTAL:

☐ Check here to change relationship

☑ 1. RP or PRP ☐ a. Owner ☐ b. Operator ☐ c. Generator ☐ d. Transporter

☑ e. Other RP or PRP Specify: OTHER PRPS

☐ 2. Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ 3. Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ 4. Any Other Person Making Submittal Specify Relationship: _____

J. REQUIRED ATTACHMENT AND SUBMITTALS:

☐ 1. Check here if the Permanent or Temporary Solution on which this opinion is based, if any, are (were) subject to any order(s), permit (s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

☐ 2. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of a Permanent or Temporary Solution Statement that relies on the public way/rail right-of-way exemption from the requirements of an AUL.

☑ 3. Check here to certify that the Chief Municipal Officer and the Local Board of Health have been notified of the submittal of a Permanent or Temporary Solution Statement with instructions on how to obtain a full copy of the report.

☑ 4. Check here to certify that documentation is attached specifying the location of the Site, or the location and boundaries of the Disposal Site subject to this Permanent or Temporary Solution Statement. If submitting a Permanent or Temporary Solution Statement for a PORTION of a Disposal Site, you must document the location and boundaries for both the portion subject to this submittal and, to the extent defined, the entire Disposal Site.

☑ 5. Check here to certify that, pursuant to 310 CMR 40.1406, notice was provided to the owner(s) of each property within the disposal site boundaries, or notice was not required because the disposal site boundaries are limited to property owned by the party conducting response actions. (check all that apply)

☑ a. Notice was provided prior to, or concurrent with the submittal of a Phase II Completion Statement to the Department.

☐ b. Notice was provided prior to, or concurrent with the submittal of this Permanent or Temporary Solution Statement to the Department.

☐ c. Notice not required. d. Total number of property owners notified, if applicable: 112

☐ 6. Check here if you are submitting one or more AULs. You must submit an AUL Transmittal Form (BWSC113) and a copy of each implemented AUL related to this Permanent Solution or Temporary Solution Statement. Specify the type of AUL(s) below: (required for Permanent Solution with Conditions Statements where an AUL is being implemented)

☐ a. Notice of Activity and Use Limitation b. Number of Notices submitted: _____

☐ c. Grant of Environmental Restriction d. Number of Grants submitted: _____

☐ 7. If a Permanent Solution Compliance Fee is required for any of the RTNs listed on this transmittal form, check here to certify that a Permanent Solution Compliance Fee was submitted to DEP, P. O. Box 4062, Boston, MA 02211.

☐ 8. Check here if any non-updatable information provided on this form is incorrect, e.g. Site Address/Location Aid. Send corrections to bwsc.edep@state.ma.us.

☑ 9. Check here to certify that the LSP Opinion containing the material facts, data, and other information is attached.

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC 104

PERMANENT AND TEMPORARY SOLUTION STATEMENT
Pursuant to 310 CMR 40.1000 (Subpart J)

Release Tracking Number
3 - 23246

For sites with multiple RTNs, enter the Primary RTN above.

K. CERTIFICATION OF PERSON MAKING SUBMITTAL:

1. I, TIMOTHY COSGRAVE, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fully authorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

2. By: TIMOTHY COSGRAVE (Signature) 3. Title: DIRECTOR EH&S

4. For: UNIFIRST CORPORATION (Name of person or entity recorded in Section H) 5. Date: 6/1/2016 mm/dd/yyyy

☐ 6. Check here if the address of the person providing certification is different from address recorded in Section H.

7. Street:

8. City/Town: 9. State: 10. ZIP Code:

11. Telephone: 12. Ext.: 13. Email:

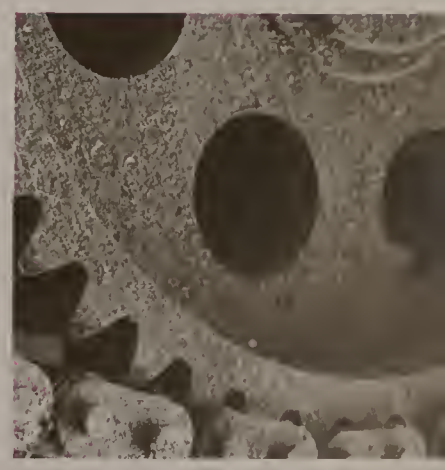
YOU ARE SUBJECT TO AN ANNUAL COMPLIANCE ASSURANCE FEE OF UP TO $10,000 PER BILLABLE YEAR FOR THIS DISPOSAL SITE. YOU MUST LEGIBLY COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE.

Date Stamp (DEP USE ONLY:)

Received by DEP on 6/7/2016 6:27:12 PM

GEI Consultants

Consulting
Engineers and
Scientists



Appendix B

Public Notification Documentation

GEI Consultants

Consulting Engineers and Scientists

June 1, 2016
Project 04516-3

Mr. Doug Kress
Director, Health Department
City Hall Annex
50 Evergreen Avenue
Somerville, MA 02145-2819

Dear Mr. Kress:

Re: Partial Permanent Solution Statement
6 Reed Court
Somerville, Massachusetts
MassDEP RTN 3-23246

On behalf of UniFirst Corporation (UniFirst) of Wilmington, Massachusetts, GEI Consultants, Inc. is notifying your office that a Partial Permanent Solution Statement has been prepared for the portion of the 50 Tufts Street disposal site (Site) identified as 6 Reed Court in Somerville, Massachusetts (Property).

The conclusions of the Partial Permanent Solution Statement include the following:

- No Significant Risk: A condition of No Significant Risk (NSR) to human health, safety, public welfare, and the environment exists for all receptors with No Conditions at the Property, and no remedial actions are required.
- Source Elimination and Control: There are no unpermitted releases of oil or hazardous material (OHM) at the Site, and the sources of OHM at the Site are eliminated to the extent feasible and are controlled.
- Migration Control: The groundwater and soil vapor plumes at the Site are stable.
- Non-Aqueous Phase Liquid (NAPL): Visible NAPL has not been observed at the Site, and any dense non-aqueous phase liquid (DNAPL) that may be present is not migrating and exists in a stable configuration. The Phase III for the Site demonstrated that it is not feasible to eliminate DNAPL.
- An Activity and Use Limitation (AUL) is not required to maintain a condition of NSR at the Property.

The Partial Permanent Solution Statement has been submitted to the Massachusetts Department of Environmental Protection (MassDEP) Northeast Regional Office in Wilmington, Massachusetts for the above-referenced Site. A copy of the report has been provided to Mr. Vithal Deshpande, Environmental Coordinator for the City of Somerville.

If you have any questions, please do not hesitate to contact me at 781-721-4012 or igladstone@geiconsultants.com.

Sincerely,
GEI CONSULTANTS, INC.

Joseph D. Roman, LSP
Project Manager / Senior Scientist

Ileen S. Gladstone, P.E., LSP, LEED AP
Senior Vice President

CMM/JDR/ISG:jj

c: Timothy Cosgrave, UniFirst Corporation
Vithal V. Deshpande, City of Somerville
Massachusetts Department of Environmental Protection

GEI Consultants

Consulting Engineers and Scientists

June 1, 2016
Project 04516-3

Mayor Joseph A. Curtatone
Somerville City Hall
93 Highland Avenue
Somerville, MA 02143-1740

Dear Mayor Curtatone:

Re: Partial Permanent Solution Statement
6 Reed Court
Somerville, Massachusetts
MassDEP RTN 3-23246

On behalf of UniFirst Corporation (UniFirst) of Wilmington, Massachusetts, GEI Consultants, Inc. is notifying your office that a Partial Permanent Solution Statement has been prepared for the portion of the 50 Tufts Street disposal site (Site) identified as 6 Reed Court in Somerville, Massachusetts (Property).

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GEI Consultants, Inc.
400 Unicorn Park Drive, Woburn, MA 01801
781.721.4000 fax: 781.721.4073

If you have any questions, please do not hesitate to contact me at 781-721-4012 or igladstone@geiconsultants.com.

Sincerely,
GEI CONSULTANTS, INC.

Joseph D. Roman, LSP
Project Manager / Senior Scientist

Ileen S. Gladstone, P.E., LSP, LEED AP
Senior Vice President

CMM/JDR/ISG:jj

c: Timothy Cosgrave, UniFirst Corporation
Vithal V. Deshpande, City of Somerville
Massachusetts Department of Environmental Protection

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